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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 **NEVADA FAIR HOUSING CENTER,**
11 **INC.,**

12 **Plaintiff,**

13 **vs.**

14 **CLARK COUNTY, etc., et al.,**

15 **Defendants.**

16 **CLARK COUNTY, a political**
17 **subdivision of the State of Nevada,**

18 **Counter-Claimant,**

19 **vs.**

20 **NEVADA FAIR HOUSING CENTER,**
21 **INC., a Nevada non-profit corporation,**

22 **Counter-Defendant.**

Case No. CV-S-05-0948-LRH-PAL
JOINT APPLICATION AND
STIPULATION TO EXTEND POST-
JUDGMENT DEADLINES;
ORDER

23 The parties hereby apply for and stipulate to issuance of order extending
24 deadlines for filing post-judgment motions, including plaintiff's motion for attorneys' fees
25 and bill costs, for sixty days.

26 There is good cause to grant this request for the following reasons:

27 First, on February 23, 2007, the Court granted plaintiff's motion for partial
28 summary judgment against defendant Clark County. (Doc. 57.) Following issuance of

1 that order, plaintiff and Clark County entered into settlement discussions to reach a
2 global resolution of the action. During the course of those negotiations, the State
3 amended the Nevada Group Home statute. On June 25, 2007, plaintiffs filed a
4 supplemental complaint challenging the Nevada Group Home statute (doc. 67), and on
5 July 9, 2008, the Court granted plaintiff's motion for partial summary judgment against
6 the State (doc. 87). On July 31, 2008, the Court entered judgment in favor of plaintiff
7 as to the State. (Doc. 89). Under Rule 54 of the Federal Rules of Civil Procedure,
8 plaintiff has 14 days after entry of judgment within which to file its motion for fees and
9 costs.

10 Second, the parties desire an opportunity to resolve the remaining issues in this
11 action by settlement.

12 Third, the parties need additional time within which to resolve the remaining
13 issues in this action.

14 Accordingly, the parties request that any deadlines triggered by the entry of the
15 judgment (doc. 89) be stayed for sixty days in order to provide the parties with sufficient
16 time to reach a global resolution of this action. In the event that the parties cannot
17 reach a resolution, then by September 30, 2008, plaintiff will file its motion for attorneys'
18 fees and bill of costs pursuant to the judgment (doc. 89), and plaintiff and Clark County

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1 will file a joint status report outlining the remedial issues to be resolved by trial.

2 Dated: August 4, 2008.

3 *Agreed to by the parties as indicated by the electronic signatures of counsel below.*

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5 FOR PLAINTIFF NFHC:

FOR DEFENDANT CLARK COUNTY:

6
7 /s/ _____
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11 FOR DEFENDANT MIKE WILLDEN:

12
13 /s/ _____
14 Cynthia Pyzel
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ORDER

Having considered the joint application and stipulation to extend deadlines for filing post-judgment motions, and good cause appearing therefor, IT IS HEREBY ORDERED that any deadlines triggered by the entry of the judgment (doc. 89) shall be stayed for sixty days in order to provide the parties with sufficient time to reach a global resolution of this action. In the event that the parties cannot reach a resolution, then by September 30, 2008, plaintiff is to file its motion for attorneys' fees and bill of costs pursuant to the judgment (doc. 89), and plaintiff and Clark County are to file a joint status report outlining the remedial issues to be resolved by trial.

IT IS SO ORDERED.

DATED: August 11, 2008.



Hon. Larry R. Hicks
U.S. District Judge